

**From:** Holt Anderson [mailto:[holt@nchica.org](mailto:holt@nchica.org)]  
**Sent:** Friday, March 25, 2011 4:51 PM  
**To:** Massey, Anita  
**Cc:** Laura Ksycewski; Andrew Weniger; Cline, Steve  
**Subject:** RFC # 201101-01"

Anita,

Thank you for the opportunity to comment on "Input on Requirements for North Carolina's Statewide Health Information Exchange Services" released on March 9, 2011.

As the vendor to put the RFP is selected and engaged, we would be pleased to spend time with them to provide insights gained from our experiences with the Office of the National Coordinator for Health Information Technology (ONC) in all phases of the development of the Nationwide Health Information Network (NwHIN) including Architectural Prototypes, Trial Implementations and currently with the Emergence Application that is connecting the 16 hospitals in the Western NC Health Network (WNCHN) through a NwHIN compliant CONNECT Gateway to the NwHIN and subsequently to the VA and the Asheville VA Medical Center. We are very familiar with those technical standards and the policy foundation expressed in the Data Use and Reciprocal Support Agreement (DURSA) that all participants in the NwHIN must execute along with the associated Operating Policies and Procedures. In fact, NCHICA has executed the DURSA as a full and active "Participant" in the NwHIN.

A few considerations as the RFP for the core services is developed are provided below:

- Health Information Exchange (HIE) is a utility and an expense item for most organizations and must be lean and return real value in order to be sustainable. Beginning with a minimum set of core services is essential to demonstrate value and engender long-term support and the funding necessary to build out a more fully-functional capabilities that most providers will need to optimize the potential for HIE.
- Based on that premise, I believe the area of authentication needs to have special attention so that the administrative overhead does not outweigh the value. For instance, there seems to be some clarity needed around the expectations and responsibilities that an organization has for allowing the use of their facilities to request and receive protected health information (PHI) by their staff. Are we going to require the authentication of every individual behind the firewalls of every enterprise or will we rely on agreements to ensure that only properly individuals authorized by that enterprise may request and receive message content that contains PHI. There is some concern about the considerable overhead that it would take in managing the identities of every provider vs. those of Qualified Organizations.
- There seems to be little attention paid in this document to national and regional exchange policies that will be required to facilitate the timely exchange with others outside NC and the RFP should recognize the considerable policy work that will need to be undertaken minimize the

overhead of protracted discussions that could take place in reconciling policies before critical information could be exchanged.

- There is reference to the NwHIN CONNECT Gateway being available as a “web service” and I am unsure of how that is being contemplated from a technical point of view.
- There seem to be some services described in the document that include Consent Management, Terminology Service, Transformation Services, and CCD Translation, and Consumer Empowerment through the use of PHRs that may want to be priced separately in the RFP. All should be considered in light of the management overhead required to maintain those functions in light of the resources available.
- The RFP should consider that several health systems have operations in other states and that there are non-geographical organizations in addition to the Federal Agencies that are part of the health care fabric of the nation and region (labs, pharmacies, insurers, vendors who establish NwHIN compliant gateways for their customers, etc.) that will have multiple channels for exchanging information and for which the NC HIE may not be their primary connection for exchange.
- The RFP also should consider the potential for administrative transactions (claims, payments, etc.) to use the capabilities of the NC HIE so that the avoidance of multiple networks that bear additional overhead helps to build the sustainability model.

I hope this is helpful and NCHICA looks forward to supporting the efforts of the State and the NC HIE Board of Directors as this important project moves forward and any questions you may have with respect to the comments above.

Regards,

Holt Anderson, Executive Director